



November 9, 2018

VIA ELECTRONIC FILING

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

RE: Notice of Ex-Parte - CG Docket Nos. 13-24, 03-123

Dear Ms. Dortch:

On November 7, 2018, Joseph Duarte, CEO of InnoCaption, and Cristina Duarte, Director of Regulatory Affairs for InnoCaption, met jointly with the following individuals: Karen Peltz Strauss, Deputy Bureau Chief, Consumer and Governmental Affairs Bureau (“CGB”), Eliot Greenwald, Deputy Chief Disability Rights Office (“DRO”), Robert Aldrich, Legal Advisor, CGB and Michael Scott, Attorney Advisor, DRO to discuss specific aspects of the open IP-CTS Rulemaking Proceeding.¹

During the meeting, InnoCaption took the opportunity to discuss the specific types of activities the Company reports as marketing. As part of this discussion, InnoCaption emphasized the importance of allowing marketing and outreach activities as allowable expenses.² As the newest provider in the IP-CTS marketplace, InnoCaption attributes its ability to grow largely to the Company participating in conventions³, exhibits, and providing presentations to those within the deaf and hard of hearing community.

Additionally, InnoCaption explained that often, the Company marketing activities and outreach activities are not mutually exclusive of one another. For example, during InnoCaption marketing presentations, we frequently educate users on other forms of TRS, accessing 911 with a hearing loss, and the existence of the Telecommunications Relay Services (TRS) fund. Accordingly, InnoCaption does not believe that outreach and marketing should be treated as separate expense categories, and both should be considered allowable expenses for Providers.

¹ *Misuse of Internet Protocol Captioned Telephone Service; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing Loss and Speech Disabilities*, Report and Order, Declaratory Ruling, Further Notice of Proposed Rulemaking, and Notice of Inquiry, FCC 18-79 (June 8, 2018) (“Order”)(“FNPRM”)

² ¶80-81

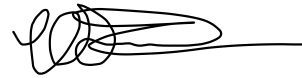
³ For example, InnoCaption has exhibited at the Hearing Loss Association of America National Convention; Association of Late Deafened Adults Convention (ALDAcon); and the AG Bell Annual Convention

Disallowing compensation for marketing expenses would likely have a detrimental impact on the dissemination of information and education regarding the availability of IP-CTS services for the community.

InnoCaption reiterated the belief that the self-certification process regarding eligibility to use IP-CTS services is the most functionally equivalent manner of enabling individuals who require the service to access it. During the meeting, InnoCaption took the opportunity to clarify that while we believe users should be allowed to continue to self-certify, it is important to make sure users understand what they are certifying to. InnoCaption strongly believes that the vast majority of IP-CTS users who have a full understanding about how the service operates, the limitations, and the permissible uses, will not misuse the service.

This notice is filed in accordance with Section 1.1206(b) of the Commission's rules.⁴

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Cristina O. Duarte', with a long horizontal line extending to the right.

Cristina O. Duarte
Director of Regulatory Affairs
MezmoCorp (dba InnoCaption)

CC: Karen Peltz-Strauss
Eliot Greenwald
Robert Aldrich
Michael Scott

⁴ 47 C.F.R. § 1.1206(b).